

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

MICHAEL A. JOY,	:	
	:	
Plaintiff,	:	C.A. No. 07-405 JJF
	:	
v.	:	TRIAL BY JURY OF 12 DEMANDED
	:	
HEALTHCARE C.M.S., and	:	
WARDEN RAPHAEL WILLIAMS,	:	
	:	
Defendants.	:	

**DEFENDANT CMS'S FIRST SET OF REQUESTS FOR
PRODUCTION OF DOCUMENTS DIRECTED TO PLAINTIFF**

Defendant Correctional Medical Services, Inc. ("CMS") by and through its undersigned counsel, requests production of the following documents within thirty (30) days from the date hereof at the offices of Balick & Balick LLC, 711 King Street, Wilmington, Delaware¹:

1. All documents referred to in Plaintiffs' Answers to Interrogatories.

RESPONSE:

2. Copies of all documents which are relevant, in whole or in part, to plaintiff's claim for damages (including but not limited to medical reports, income and tax records).

RESPONSE:

¹ The instructions and definitions set forth in Defendant's Interrogatories Directed to Plaintiff are incorporated herein by reference.

3. Copies of all documents which are relevant, in whole or in part, to plaintiff's claim for lost wages.

RESPONSE:

4. If you claim any loss of support, loss of income, loss of future income, or impairment of earning capacity in this lawsuit, please produce Federal and State income tax returns for the years 1998 through the present.

RESPONSE:

5. Copies of all bills and receipts evidencing payment of bills for which the plaintiff seeks compensation in this lawsuit.

RESPONSE:

6. Copies of the curriculum vitae of all experts you intend to call at trial.

RESPONSE:

7. Any journals, diaries, logs or other documents or recordings kept by the plaintiff.

RESPONSE:

8. All documents which you provided to, or upon which any expert retained by you in connection with this lawsuit relies in forming his or her opinion.

RESPONSE:

9. Copies of all correspondence or written or recorded report made by each physician or other medical personnel to whom you have gone for consultation or examination concerning your physical, mental, or emotional condition.

RESPONSE:

10. All documents upon which you intend to rely at trial.

RESPONSE:

11. All documents which tend to support or refute any of your claims against CMS.

RESPONSE:

12. Copies of every grievance and/or sick call request you submitted relevant to the claims against CMS in the Complaint, the Amended Complaint and the Second Amended Complaint.

RESPONSE:

BALICK & BALICK L.L.C.

/s/ James E. Drnec
James E. Drnec (DE Bar # 3789)
711 King Street
Wilmington, DE 19801
(302) 658-4265
Attorneys for Correctional Medical Services, Inc.

Dated: June 11, 2008

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

MICHAEL A. JOY,	:	
	:	
Plaintiff,	:	C.A. No. 07-405 JJF
	:	
v.	:	TRIAL BY JURY OF 12 DEMANDED
	:	
HEALTHCARE C.M.S., and	:	
WARDEN RAPHAEL WILLIAMS,	:	
	:	
Defendants.	:	

NOTICE OF SERVICE

I, James Drnec, hereby certify that on this 11th day of June, 2008, Defendant CMS' First Set of Requests for Production of Documents Directed to Plaintiff was served on the following by First Class mail:

Michael A. Joy
SBI# 519040
Howard R. Young Correctional Institution
P.O. Box 9561
Wilmington, DE 19809

BALICK & BALICK L.L.C.

/s/ James E. Drnec
James E. Drnec (DE Bar # 3789)
711 King Street
Wilmington, DE 19801
(302) 658-4265
Attorneys for CMS

Dated: June 11, 2008

CERTIFICATE OF SERVICE

I, James Drnec, hereby certify that on the 11th day of June 2008, the foregoing Defendant CMS' First Set of Requests for Production of Documents Directed to Plaintiff was filed via CM/ECF and served upon the following via First Class Mail:

Michael A. Joy
SBI# 519040
Howard R.Young Correctional Institution
P.O. Box 9561
Wilmington, DE 19809

/s/ James E. Drnec
James E. Drnec, Esquire (#3789)